

DANIEL G. BOGDEN  
United States Attorney  
CRISTINA D. SILVA  
Nevada Bar No. 13760  
ELHAM ROOHANI  
Nevada Bar No. 12080  
Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
Phone: (702) 388-6336  
Email: cristina.silva@usdoj.gov  
Email: elham.roohani@usdoj.gov

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,	)	Case No.: 2:14-cr-00279-APG-VCF
	)	
Plaintiff,	)	<b><u>STIPULATION TO CONTINUE</u></b>
	)	<b><u>FURTHER BRIEFING DEADLINE</u></b>
vs.	)	<b><u>(First Request)</u></b>
	)	
BRET ALAN HUMPHRIES,	)	
	)	
Defendant.	)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Cristina D. Silva and Elham Roohani, Assistant United States Attorney, counsel for the United States of America, and Thomas Ericsson, counsel for Bret Alan Humphries, that the briefing schedule currently in place – Brief due July 22, 2016, Response due August 5, 2016, and Reply due August 12, 2016 – pursuant to ECF No. 92 be continued and reset to Brief due August 19, 2016, Response due September 2, 2016, and Reply due September 9, 2016.

This Stipulation is entered into for the following reasons:

1. Despite seeking expedited transcripts from the most recent hearing held on June 30, 2016, the Government still has not received transcripts from the hearing. Government counsel has been advised that the transcripts will be prepared no later than June 29, 2016.
2. Additionally, Counsel for the Government will be traveling outside the district from August 7, 2016 to August 12, 2016. The proposed dates are intended to maintain the same time schedule as previously set forth by the court and taking into account unavoidable delays.
3. Counsel for the Government made contact with defendant's counsel who advised he did not object to the continuance.
4. The defendant is in custody, but does not object to a continuance of the response deadline.
5. The additional time requested herein is not sought for purposes of delay, but to allow for counsel for the Government to file the response taking into account due diligence and unforeseen delays in obtaining the hearing transcripts.
6. This is the first request to extend the response deadline.

DATED this 15th day of July, 2016.

DANIEL G. BOGDEN,  
United States Attorney

THOMAS ERICSSON, ESQ.

By: /s/Cristina D. Silva

By: /s/Elham Roohani

CRISTINA D. SILVA

ELHAM ROOHANI

Assistant United States Attorneys

By: /s/Thomas Ericsson

THOMAS ERICSSON, ESQ.

Counsel for Bret Humphries

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,	)	Case No.: 2:14-cr-00279-APG-VCF
	)	
Plaintiff,	)	<b><u>ORDER ON STIPULATION</u></b>
	)	
vs.	)	
	)	
BRET ALAN HUMPHRIES,	)	
	)	
Defendant.	)	

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby finds that:

7. Despite seeking expedited transcripts from the most recent hearing held on June 30, 2016, the Government still has not received transcripts from the hearing. Government counsel has been advised that the transcripts will be prepared no later than June 29, 2016.
8. Additionally, Counsel for the Government will be traveling outside the district from August 7, 2016 to August 12, 2016. The proposed dates are intended to maintain the same time schedule as previously set forth by the court and taking into account unavoidable delays.
9. Counsel for the Government made contact with defendant's counsel who advised he did not object to the continuance.
10. The defendant is in custody, but does not object to a continuance of the response deadline.
11. The additional time requested herein is not sought for purposes of delay, but to allow for counsel for the Government to file the response taking into account due diligence and unforeseen delays in obtaining

1 the hearing transcripts.

2 12. This is the first request to extend the response deadline.

3 THEREFORE, FOR GOOD CAUSE APPEARING, IT IS HEREBY  
4 ORDERED that the deadlines set forth in ECF No. 92 are vacated and reset to Brief  
5 due August 19, 2016, Response due September 2, 2016, and Reply due September 9,  
6 2016.

7 Dated this 18<sup>th</sup> day of July, 2016.

8  
9 

10 UNITED STATES MAGISTRATE JUDGE  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24